

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF ARKANSAS
CENTRAL DIVISION**

**TRAVIS BARKLEY and JEFFREY
BURFEIND**

PLAINTIFFS

V.

CASE NO. 4:19-cv-847-BSM

**BOY SCOUTS OF AMERICA and
QUAPAW AREA COUNCIL INCORPORATED
OF THE BOY SCOUTS OF AMERICA**

DEFENDANTS

MOTION FOR LEAVE TO AMEND COMPLAINT

COME NOW Plaintiffs, by and through undersigned counsel, and for their Motion for Leave to Amend the Complaint, state as follows:

1. Plaintiffs seek to amend to add as a defendant The Salvation Army, which, upon information and belief, was the chartering organization that sponsored the Boy Scouts troop to which Plaintiffs belonged. Upon information and belief, The Salvation Army also employed Sam Otts, the volunteer scout leader Plaintiffs claim sexually abused them as children.
2. The Salvation Army's principal address is 1424 Northeast Expressway, Atlanta, GA 30329. Its Arkansas registered agent is the C.T. Corporation, which can be served with process at 124 West Capitol Ave., Suite 1400, Little Rock, AR 72201.
3. Additionally, Plaintiffs seek to make as an exhibit to the proposed First Amended Complaint the Affidavit of Wesley Walraven, only recently obtained.
4. A copy of the proposed amendment, Plaintiffs' First Amended Complaint, is attached hereto as Exhibit 1.

Respectfully Submitted,

/s/ Joshua D. Gillispie
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Counsel for Plaintiffs

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was electronically filed on this 17th day of November, 2023, and service shall be accomplished via the court's electronic filing system and/or US Mail on all counsel of record.

/s/ Joshua D. Gillispie
Joshua D. Gillispie